



Speak Up: Raising Concerns and Non-Retaliation Policy

Procedure Owner: Chief Ethics and Compliance Officer

Effective Date: 01.08.2022

I. Summary and Purpose

The objectives of this Policy are:

- to make clear that knowledge of potential violations of Cellfie Mobile's (hereinafter "company") policies, applicable law or regulations, or misconduct involving or implicating CELLFIE, the Company or their respective employees must be promptly reported.
- to provide information on how to properly report or raise concerns and issues of potential violations or misconduct; and
- to ensure that company Personnel are able to raise concerns and issues without fear of retaliation.

II. Applicability and Scope

This Policy applies to the Company Personnel, and Business Partners, as well as contractors, consultants, and temporary employees or secondees.

This Policy establishes standards of conduct and practice for reporting (i) potential or known violations, or attempts to conceal potential or known violations, of CELLFIE's Code of Conduct (**Code**) or other Company policies or procedures, or applicable law or regulations and (ii) potential or known misconduct involving or implicating CELLFIE, the Company or their respective employees. It is not intended to apply to general customer complaints (e.g., service quality, pricing) or individual employment concerns (e.g., regarding bonuses, performance reviews, managerial decision-making, etc.) that do not relate to potential violations of the Code or other policies. Customer complaints are handled by the customer service function, and individual employment issues should be reported to the employee's line manager or Human Resources.

This Policy and other relevant policies and procedures set a minimum standard that must be followed. Where local laws, regulations, or rules impose a higher standard, that higher standard must be followed. Company may adopt stricter standards than those set forth in this Policy.

However, Company must obtain written approval from the Policy Owner prior to adopting any standard that is less strict than set forth in this Policy.

III. Definitions

Business Partner: Any agent, representative, intermediary, or other third party authorized to act for or on behalf of Company.

Company Personnel: Any director, officer, or employee of Company.

IV. Policy Requirements

One of CELLFIE's core values is truthfulness, and implicit in this value is the need for transparency and openness across the company. Anyone who has knowledge of potential violations (of policy, law, regulation, etc.) or misconduct involving or implicating Company or knowledge of attempts to conceal such misconduct, should promptly **"Speak Up"** using the channels described in this Policy.

In making or addressing a "Speak Up" report, CELLFIE Personnel, and the Company must adhere to the following principles:

- a. Company Takes Reports Seriously:** Company takes all reports of potential policy violations or misconduct seriously and is committed to reviewing and investigating all credible allegations. Anyone who receives a report covered by this Policy must treat the information with discretion and treat the person who raised the concern with respect. The person who received the report must also promptly inform Compliance about the concern or allegation.
- b. Reports Must be Honestly Made:** Ensuring transparency and openness and promoting "speaking up" is fundamental; in turn, the making of a report must be done with honesty and integrity and on an informed basis. Knowingly making a false report, or raising an issue or concern in bad faith, is contrary to the Code and will be considered a violation of this Policy.
- c. Company Will Not Tolerate Retaliation:** Company employees should feel comfortable reporting concerns and possible misconduct. Company will not tolerate reprisal, retaliation, or subsequent discrimination against any person who in good faith raises a concern or reports possible misconduct. Any Company employee who takes adverse actions against others for making a "Speak Up" report in good faith, or otherwise retaliates or attempts to retaliate, will be subject to disciplinary action. An employee who believes they have experienced adverse action, discrimination, reprisal, or other retaliation for raising a concern should report this immediately to Compliance, Legal, or Human Resources.

- d. **Company Takes Steps to Preserve Confidentiality and Anonymity:** Company handles allegations of misconduct or wrongdoing confidentially and according to applicable laws and regulations. Whichever method of reporting is selected, when anonymity is requested, Company will work to preserve anonymity as permitted under local law.

V. Speak Up Channels

Concerns or reports of allegations of potential violations or misconduct under this Policy may be raised through any of several channels, at the choosing of the person making the report. Certain channels allow for anonymity as indicated below.

Reporting Method	Channels
Direct Reports	Company Personnel may make direct reports to: • A line manager; • Another manager or supervisor; • Representatives of the Compliance, Legal, or Human Resources departments.
E-mail Compliance	Individuals may report issues or ask questions to Compliance at compliance@cellfie.ge
IDC	Company has an IDC committee for such cases and you can email any concern at IDC@cellfie.ge
Anonymity guarantee	Everyone can state the problem anonymously, no matter the channel (face-to-face or written) If the anonymity has been requested; the company according to the jurisdiction will ensure the fulfillment of the request.



VI. Useful Information When Making a Report

Company encourages reporters to provide as much information as possible when making a report. Providing detailed information will help Company determine the best way to address the report. Failure to provide all relevant information may inhibit company's ability to conduct a thorough and swift investigation.

When making a report, it is helpful to provide:

- The name, title, and/or department of the person who engaged in the conduct that is the subject of the report;
- The date that the conduct occurred (month, year, and date, if known);
- Whether anyone has previously raised this concern to anyone else at CELLFIE and what (if any) actions occurred after the concern was raised;
- Whether the source would like to remain anonymous; and
- Contact information, so that Company may follow up with the source as appropriate. Without contact information, Company will not be able to contact the source once a report has been made.

VII. Where to Go for Help

If you have questions about this Policy or believe that someone may have violated it, please contact Compliance Officer at compliance@cellfie.ge. You also may submit a question or concern at IDC@cellfie.ge. Company does not tolerate any form of retaliation, harassment, or intimidation of any person who has reported a concern in good faith.

Company will investigate alleged misconduct in relation to this Policy in accordance with the Company procedures on investigations. Any Company Personnel who violate this Policy may be subject to disciplinary measures, up to and including termination of employment.

VIII. Reference Documents

The following policies and procedures provide additional guidance and direction:

Title
Code of Conduct
ABC Policy
Investigation Procedure

All policies, procedures, and guidelines can be found in the Compliance section on SharePoint.